

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,
Plaintiffs,

v.

GREG ABBOTT, *et al.*,
Defendants.

Civil Action No. 2:13-cv-193 (NGR)
(Consolidated Action)

REVISED DECLARATION OF GARY L. BLEDSOE
IN SUPPORT OF REQUEST FOR ATTORNEY'S FEES

I, Gary Bledsoe, hereby declare as follows:

1. I am co-counsel for Plaintiff, Texas State Conference of NAACP Branches ("Texas NAACP"), in the above-captioned case. The testimony set forth in this Declaration is based on first-hand knowledge, about which I could and would testify competently in open court. This Declaration is submitted in support of Plaintiff's Motion for Attorney's Fees and Costs. Plaintiffs are prevailing parties in this action and are entitled to attorney's fees and costs as authorized by the Voting Rights Act, 42 U.S.C. §19731(e) as amended 2006.
2. I became involved in this litigation in 2013 along with counsel from the National NAACP and other experienced Voting Rights and Trial counsel to represent Texas NAACP.

3. I am a National Board Member and President of the Texas NAACP, former Board Member of Texas Southern University and a litigator with The Bledsoe Law Firm, PLLC among the many positions I have had over time in the legal profession. During my tenure as a lawyer, I have won numerous awards such as a Young Lawyer of the Year Award from the Austin Young Lawyer's Association, a Texas Attorney General Lawyer of the Year Award, and lead the Texas NAACP to receive awards such as the Juanita Jackson Mitchell Award for Advocacy. I worked on voting rights cases as an Assistant Attorney General and Special Assistant Attorney General, handled voting rights cases in private practice involving Constables, Justices of the Peace, the State Legislature and the United States Congress. I have represented the Texas NAACP in litigation as well as three members of the United States Congress, and a Galveston County Commissioner. I have also handled Voter Identification Litigation as well, being one of the lawyers that challenged Texas 2011 Voter Identification Law in the District of Columbia. We prevailed in the District of Columbia case but the decision was reversed by the United States Supreme Court. I helped lead efforts to extend the Voting Rights Act back in 2006, and have participated in and coordinated many election protection efforts to protect voters as well as many hearings to collect information on voter irregularities around the State. I was an invited witness

to testify in regards Voter Identification in the Texas Senate back in 2011 and was invited last week to appear before a Committee of the United States Congress to provide testimony on voter irregularities in Texas. I have filed briefs with the United States Supreme Court and have argued a number of cases before the 5th Circuit Court of Appeals and various Texas Appellate Courts. Currently I am the Vice Chair of the National NAACP Legal Committee. I have co-authored a number of amicus and other briefs before the United States Supreme Court on civil rights issues including voting rights. See Attachment No. 1.

4. There were expert counsel in the area of Voting Rights so I deferred to them to take the lead role but believe that I played an important role in helping to advance Plaintiffs' interests.
5. I am requesting compensation for a total of 74.35 hours spent on the case. I have attached the time records maintained in this action. See Attachment No. 2.
6. Daily time records were not always kept in this matter. Secondly, because of a problem with malware some items we no longer have access to. However, I have independent recollection of receiving and reviewing motions, pleadings, or briefs herein identified and have email documentation to confirm

many of the actions described in the attached time document, and there are other documents such as email communications that support the billing.

7. The lodestar calculation is made based upon reasonable hourly rates for all current attorneys. For this case, Plaintiffs ask that the Court to adopt the USAO attorney's fees matrix, for 2015-2019 in light of recent fee awards in the Southern District of Texas, which are similar to the matrix index. I have been licensed since 1976 and make the hourly request for services at \$613.00 per hour. I travelled to the 5th Circuit Court of Appeals and is not charging for time but would like to be reimbursed for my expenses. I also travelled to Corpus Christi and incurred travel and hotel expenses. The driving distance is 217 miles. Charging \$0.50 per mile the amount to be repaid would be \$108.50 each way or \$217 round trip.
8. Applying these rates to the hours expended, the total fees sought by Gary Bledsoe is \$45,576.55 for the hours for which payment is sought and \$1,250.72¹ for total expenses (travel and hotel to Corpus Christi for trial and travel to the 5th Circuit Court of Appeals). The total amount sought is \$46,827.27.

¹ Upon submitting a revised affidavit, I tasked my paralegal to look for receipts and/or statements regarding my expenses to Corpus Christi in 2014. My paralegal found several expenses which are now included in the amount I am seeking in attorney's fees and costs.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and that this Declaration was prepared in Austin, Travis County, Texas on July 12, 2019.

/s/Gary L. Bledsoe
Gary L. Bledsoe